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7 **UNITED STATES DISTRICT COURT FOR THE**
WESTERN DISTRICT OF WASHINGTON
8

9 Levi Bussanich (in his individual and official
10 capacity;
Desire NW, Inc. (AKA Desire Video);

NO. 3:16-cv-5231

11 Plaintiffs;

12 v.
13 **COMPLAINT FOR DAMAGES**
14 **AND JURY DEMAND**

15 Adult Video Only, Inc. (AKA Cindy's
16 Bookstore);
AAV Ltd (AKA AAA Leasing Co.);
The Bookstore, Inc.;
The Bookstore, Inc.-2;
Cossette and Wright Partnership;
17 Daniel Cossette and Donna Cossette, Husband
and Wife and the marital community
comprised thereof;
Michael J. Wright and Linda M. Wright (AKA
18 Linda Cossette), Husband and Wife and the
marital community comprised thereof;
Mark Fuston;
Jeremy Coughlin;

19
20
21 Defendants.
22

23 **I. Complaint**

24 1.1 This is a civil action seeking damages against the above named Defendants.

25 The civil claims include the following federal and state causes of action: (1) RICO Section

1 1962(a), (2) RICO Section 1962(b), (3) RICO Section 1962(c), (4) RICO Section 1962(d), (5)
2 Criminal Profiteering under RCW 9A.82.100 and RCW 9A.82.080, (6) Criminal Profiteering
3 under RCW 9A.82.100 and 9A.82.060, (7) Trespass to Property, Damage to Property, and
4 Waste, and (8) Conversion.

5 1.2 The doctrines of accrual, equitable tolling, estoppel, *respondeat superior*, and
6 piercing the corporate veil apply to this action.

7 II. Introduction

8 2.1 Defendants, via an enterprise or association in fact, intentionally and willfully,
9 engaged in a continuous pattern of racketeering activity that destroyed Plaintiffs' business
10 and harmed his person and property. Defendants were economically motivated and their
11 actions crossed state lines. Defendants also trespassed on and converted Plaintiffs' property.
12

13 2.2 Plaintiffs discovered Defendants' wrongdoing when Defendant Mark Fuston
14 admitted to law enforcement and federal prosecutors, in a criminal action before this same
15 Court, that he and the other named Defendants had engaged in the illegal and wrongful acts
16 stated above. These act are detailed herein.

17 2.3 Specifically, Defendant Mark Fuston, pled guilty to conspiring, to commit the
18 crime of arson, with the other named Defendants in this action. He went to prison for that
19 conspiracy. Conspiracies, by definition, require overt acts and a culpable *mens rea* by other
20 persons involved. The federal prosecution of Defendant Mark Fuston revealed, and brought
21 to light, many other wrongs and acts committed by all Defendants named in this action.
22 Consequently, Plaintiffs—unable to bring a cause of action until these wrongs were recently
23 discovered and Defendant Mark Fuston was prosecuted in federal court—now seek damages
24 as pled in this meritorious and timely pled Complaint.

III. Jurisdiction and Venue

3.1 This Court has subject matter jurisdiction over this action pursuant to 28 U.S.C.

§ 1331 and 18 U.S.C. § 1964 as Plaintiffs' claims raise federal questions.

3.2 This Court also has diversity jurisdiction pursuant to 28 U.S.C. § 1332 as there are Defendants that reside in different States and the matters in controversy exceed the sum or value of \$75,000.01, exclusive of interest and costs.

3.3 This Court has jurisdiction over Plaintiffs' state law claims pursuant to 28
U.S.C. § 1337.

3.4 Venue is proper in this judicial district pursuant to 18 U.S.C. § 1965 and 28 U.S.C. § 1391 because Defendants are subject to personal jurisdiction in this judicial district, Defendants reside in this judicial district, substantial part of the events or omissions giving rise to Plaintiffs' claims occurred in this judicial district, and the property that is subject to this suit is situated in this judicial district.

IV. Parties

4.1 Plaintiff Levi Bussanich is resident of Olympia, Washington State, and president of Plaintiff Desire NW, Inc. (AKA, Desire Video). He is a "person" under U.S.C. § 1961 who may maintain a private right of action. He sustained direct injury to his business, property, and person by reason of Defendants wrongful commission of acts and violations as stated herein.

4.2 Plaintiff Desire NW, Inc. (AKA and herein after, "Desire Video") is a Washington corporation with its principal place of business in Olympia, Washington. Plaintiff Desire Video is an adult novelty store that was in direct competition with Defendants. The registered agent and president is Plaintiff Levi Bussanich, United States

1 Code Section 1964(c) creates a private right of action for any "person" who has suffered a
2 compensable injury. The term "person" has been interpreted liberally to include natural
3 persons, partnerships, joint ventures, corporations, and governmental entity suing for their
4 own injuries.

5 4.3 Defendant "Adult Video Only" is an Oregon corporation with its principal place
6 of business in Gresham, Oregon, registry number 290667-84 (date of registry 4/7/1992).
7 Under U.S.C. § 1961 this Defendant is and was culpable "person" or "entity capable of holding
8 a legal or beneficial interest in property" at all times relevant to this Complaint. It acted
9 intentionally, willfully, and with knowledge of the enterprise's illegal activities. The
10 authorized representative is Defendant Linda M. Wright, and the Registrant is Defendant The
11 Bookstore, Inc., whose registered agent and secretary is Defendant Linda M. Wright and
12 whose president is Defendant Michael J. Wright. These officers acted intentionally, willfully,
13 and with knowledge of the enterprise's illegal activities.

15 4.4 Defendant "AAV Ltd" also known as "AAA Leasing Co." is an Oregon
16 corporation with its principal place of business in Milwaukie, Oregon, registry number
17 158700-17 (registry date 2/11/1982). Under U.S.C. § 1961 this Defendant is and was a
18 culpable "person" or "entity capable of holding a legal or beneficial interest in property" at
19 all times relevant to this Complaint. It acted intentionally, willfully, and with knowledge of
20 the enterprise's illegal activities. The president is Defendant Daniel L. Cossette and the
21 secretary is Defendant Donna L. Cossette. These officers acted intentionally, willfully, and
22 with knowledge of the enterprise's illegal activities.

24 4.5 Defendant "The Bookstore, Inc." also known as "Cindy's Bookstore" is an
25 Oregon corporation with its principal place of business in Portland, Oregon, registry Number

1 200206-16 (registry date 5/21/1984). Under U.S.C. § 1961 this Defendant is and was a
2 culpable “person” or “entity capable of holding a legal or beneficial interest in property” at
3 all times relevant to this Complaint. It acted intentionally, willfully, and with knowledge of
4 the enterprise’s illegal activities. The registered agent and secretary is Defendant Linda M.
5 Wright, and the president is Michael J. Wright. These officers acted intentionally, willfully,
6 and with knowledge of the enterprise’s illegal activities.

7 4.6 Defendant “The Bookstore, Inc.-2” is a Washington corporation with its
8 principal place of business in Vancouver, Washington, UBI Number 602810496 (Filing Date
9 03/05/2008). Under U.S.C. § 1961 this Defendant is and was a culpable “person” or “entity
10 capable of holding a legal or beneficial interest in property” at all times relevant to this
11 Complaint. It acted intentionally, willfully, and with knowledge of the enterprise’s illegal
12 activities. The registered agent, secretary, and chairman is Defendant Linda M. Wright, the
13 president is Defendant Daniel Cossette, the vice president is Defendant Michael J. Wright,
14 and the treasurer is Defendant Donna Cossette. These officers acted intentionally, willfully,
15 and with knowledge of the enterprise’s illegal activities.

17 4.7 Defendant “Cossette and Wright Partnership” is an Oregon
18 Partnership/Corporation with its principal place of business in Portland, Oregon, registry
19 Number 440818-83 (registry date 03/02/1995). Under U.S.C. § 1961 this Defendant is and
20 was a culpable “person” or “entity capable of holding a legal or beneficial interest in
21 property” at all times relevant to this Complaint. It acted intentionally, willfully, and with
22 knowledge of the enterprise’s illegal activities. The registered agent is Defendant Linda M.
23 Wright and Defendant Daniel Cossette and Defendant Michael J. Wright. Partners/officers
24 Defendant Michael J. Wright, Linda M. Wright, Daniel Cossette, and Donna Cossette, acted

1 intentionally, willfully, and with knowledge of the enterprise's illegal activities.

2 4.8 Defendant Daniel Cossette is a resident of Milwaukee, Oregon. Under U.S.C. §
3 1961 this Defendant is and was a culpable "person" or "entity capable of holding a legal or
4 beneficial interest in property" at all times relevant to this Complaint. He is an officer and
5 president of Defendant "AAV Ltd" also known as "AAA Leasing Co." He is an officer and
6 president of Defendant "The Bookstore, Inc.-2." He is an officer/partner of Defendant
7 "Cossette and Wright Partnership." At all times relevant to this Complaint, he was married
8 to Defendant Donna Cossette and he acted intentionally, willfully, and with knowledge of the
9 enterprise or association in fact's illegal activities, and all acts complained of herein were
10 done both individually and for the benefit of the marital community.

11 4.9 Defendant Donna Cossette is a resident of Milwaukee, Oregon. Under U.S.C. §
12 1961 this Defendant is and was a culpable "person" or "entity capable of holding a legal or
13 beneficial interest in property" at all times relevant to this Complaint. She is an officer and
14 secretary of Defendant "AAV Ltd" also known as "AAA Leasing Co." She is an officer and
15 treasurer of Defendant "The Bookstore, Inc.-2." She is an officer/partner of Defendant
16 "Cossette and Wright Partnership." At all times relevant to this Complaint, she was married
17 to Defendant Daniel Cossette and she acted intentionally, willfully, and with knowledge of
18 the enterprise or association in fact's illegal activities, and all acts complained of herein were
19 done both individually and for the benefit of the marital community.

20 4.10 Defendant Michael J. Wright at all times relevant to this Complaint was and is
21 a resident of Portland, Oregon. Under U.S.C. § 1961 this Defendant is a culpable "person" or
22 "entity capable of holding a legal or beneficial interest in property." He is an officer and
23 president of Defendant of "Adult Video Only." He is an officer and president of Defendant
24

1 "The Bookstore, Inc." He is an officer and president of Defendant "The Bookstore, Inc.-2." He
 2 is an officer/partner of Defendant "Cossette and Wright Partnership." At all times relevant
 3 to this Complaint, he was married to Defendant Linda M. Wright and he acted intentionally,
 4 willfully, and with knowledge of the enterprise or association in fact's illegal activities, and
 5 all acts complained of herein were done both individually and for the benefit of the marital
 6 community.

7 4.11 Defendant Linda M. Wright (AKA Linda Cossette) at all times relevant to this
 8 Complaint was and is a resident of Portland, Oregon, or Maricopa, Arizona. Under U.S.C. §
 9 1961 this Defendant is a culpable "person" or "entity capable of holding a legal or beneficial
 10 interest in property." She is an officer and secretary of Defendant "Adult Video Only." She is
 11 an officer and secretary of Defendant "The Bookstore, Inc." She is an officer, secretary, and
 12 chairman of Defendant "The Bookstore, Inc.-2." She is an officer/partner of Defendant
 13 "Cossette and Wright Partnership." At all times relevant to this Complaint, she was married
 14 to Defendant Michael J. Wright and she acted intentionally, willfully, and with knowledge of
 15 the enterprise or association in fact's illegal activities, and all acts complained of herein were
 16 done both individually and for the benefit of the marital community.

18 4.12 Defendant Mark Fuston at all times relevant to this Complaint was and is a
 19 resident of Portland, Oregon. Under U.S.C. § 1961 this Defendant is a culpable "person" or
 20 "entity capable of holding a legal or beneficial interest in property." He acted intentionally,
 21 willfully, and with knowledge of the enterprise or association in fact's illegal activities.

23 4.13 Defendant Jeremy Coughlin at all times relevant to this Complaint was and is
 24 a resident of Washington State. Under U.S.C. § 1961 this Defendant is a culpable "person" or
 25 "entity capable of holding a legal or beneficial interest in property." He acted intentionally,

1 willfully, and with knowledge of the enterprise or association in fact's illegal activities.

2

3 **V. Factual Allegations Supporting All Claims and Accrual and Equitable**
Tolling and/or Estoppel of the Statute of Limitations

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5 5.1 The facts in the following paragraphs and sections detailing factual
6 information as to Plaintiffs' claims did not become apparent to Plaintiffs until the end of
7 2013, despite Plaintiffs' due diligence, when federal prosecutors brought charges in this
8 Court against one of the Defendants, Mark Fuston, and convicted him for conspiracy to
9 commit arson. The conviction was thanks to the secretive work of law enforcement and two
10 confidential informants. (Attachment 1, Newspaper Article #1 (hereby incorporated by
11 reference and attached to this Complaint); Attachment 2, Newspaper Article #2(hereby
incorporated by reference and attached to this Complaint)).

12

13 5.2 Defendants' well-coordinated, illegal, and wrongful conduct and conspiracy
14 covering up facts and information regarding their egregious and illegal conduct prevented
15 Plaintiffs from detecting the wrongs committed by Defendants and prevented Plaintiffs from
16 having a meaningful opportunity to bring a warranted cause of action against them.

17

18 5.3 Defendants' cover up was of such magnitude that law enforcement worked the
19 case in secret for years—all but giving up—until one of the conspirators and wrongdoers,
Ken Courtney, turned against his fellow conspirators and became a federal informant.

20

21 5.4 Plaintiffs were the victim to Defendants' unlawful actions when his adult
22 novelty business, Plaintiff Desire Video, located at 4811 NE 94th Ave. Vancouver, WA, was
intentionally burned to the ground.

23

24 5.5 Plaintiffs pursued an insurance claim that was resisted by his insurance
carrier.

1 5.6 Law enforcement continued to confidentially work the case, suspecting arson
2 was the cause of the fire to Desire Video. Plaintiffs, however, were not privy to the results
3 of law enforcement's confidential investigation, as they could have been suspects
4 themselves.

5 5.7 The result of confidential police work, law enforcement eventually determined
6 that a man named Ken Courtney purchased equipment to burn down Desire Video. Law
7 enforcement also discovered Ken Courtney worked at Defendants' rival adult novelty
8 businesses, Defendant The Bookstore, Inc., Defendant Adult Video Only, Inc., and Defendant
9 AAV Ltd. Law enforcement secretly suspected Ken Courtney was involved in arsons
10 committed in years' prior, hired by the other named Defendants, at another adult
11 novelty/retail business in Spokane, Washington, as detailed in the criminal action, Western
12 District Court of Washington cause number 3:13-cr-05214-BHS. (Attachment 3, Documents
13 number 32 and 44 (hereby incorporated by reference and attached to this Complaint)). Law
14 enforcement secretly believed that Defendants Daniel Cossette, Donna Cossette, Michael J.
15 Wright, and Linda M. Wright, in their individual and official capacities, had hired and directed
16 Ken Courtney's illegal actions for the purpose of destroying competition of Defendant The
17 Bookstore, Inc., Defendant Adult Video Only, Inc., and Defendant AAV Ltd.
18

19 5.8 By 2004, law enforcement, including Alcohol, Tobacco, and Firearms
20 Detectives ("ATF") had maintained a confidential investigation with the goal of indicting Ken
21 Courtney's employers, i.e., named Defendants The Bookstore, Inc., Adult Video Only, Inc.,
22 AAV Ltd, Daniel Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright. This plan
23 involved the use of a confidential informant getting close to Ken Courtney.
24

25 5.9 The confidential informant was able rent an apartment in an apartment

1 complex that Ken Courtney managed. Over the course of the next year, the confidential
2 informant was able get enough compromising information from Ken Courtney to justify a
3 search warrant of Ken Courtney's residence.

4 5.10 Ken Courtney was present during the warrant's execution and confessed his
5 involvement in the arson on Desire Video. He stated he made the incendiary device that
6 burnt down Plaintiffs' business, Desire Video, at the bequest of Defendants, in their
7 individual and official capacities and in control of and managing the association in fact,
8 Daniel Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright for the benefit of all
9 Defendants. Ken Courtney then agreed to work undercover for the ATF to gather
10 information with the goal of indicting Defendants Daniel Cossette, Donna Cossette, Michael
11 J. Wright, and Linda M. Wright for crimes committed.
12

13 5.11 Ken Courtney identified Defendant Mark Fuston as the person Defendants
14 Daniel Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright hired to place the
15 incendiary device at Desire Video.
16

17 5.12 In 2005 confidential law enforcement investigations reveal that Defendant
18 Mark D. Fuston was solicited by Defendants Daniel Cossette and Michael J. Wright, acting in
19 their personal and official capacity and in control of and managing the association in fact, to
20 end Plaintiff Levi Bussanich's life and throw hand grenades into Plaintiffs business, the newly
21 rebuilt Desire Video.
22

23 5.13 In 2006, Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, and
24 Linda M. Wright put Defendant Adult Video Only, Inc., Defendant The Bookstore, Inc., and
25 AAV Ltd up for sale. A "for sale" sign was placed on Defendant Adult Video Only, Inc. The
geographic business location of Defendant Adult Video Only, Inc. was in close proximity to

1 the geographic business location of Plaintiff Desire Video, which had been rebuilt after the
 2 before described arson. The two businesses were less than one mile away. President of
 3 Plaintiff Desire Video, Plaintiff Levi Bussanich saw the "for sale" sign and inquired into
 4 purchasing Defendant Adult Video Only, Inc. He wrote and mailed a letter to "Attention
 5 Owners," as he did not know the owners' names. He delivered the letter to a clerk working
 6 Defendant Adult Video Only, Inc.

7 5.14 A few days later, Defendant Daniel Cossette responded via a telephone call to
 8 Plaintiff Levi Bussanich letter, inquiring into purchasing Defendant Adult Video Only, Inc.
 9 Defendant Daniel Cossette left a voicemail on Plaintiff Levi Bussanich's phone while he was
 10 out of the country in the Philippines. Plaintiff Levi Bussanich received the message from
 11 Defendant Daniel Cossette, despite being in the Philippines. From the Philippines, Plaintiff
 12 Levi Bussanich drafted and sent an email to his regional manager. (Attachment 4, Email
 13 (hereby incorporated by reference)). Plaintiff Levi Bussanich was excited about the potential
 14 of purchasing Defendant Adult Video Only, Inc.

16 5.15 The regional manager researched Defendant Adult Video Only, Inc. and replied
 17 to Plaintiff Levi Bussanich with general business information he was able to discover about
 18 Defendant Adult Video Only, Inc. (Attachment 4, Email).

19 5.16 Upon returning from the Philippines, Plaintiff Levi Bussanich returned
 20 Defendant Daniel Cossette's telephone call and they set up a formal meeting to take place
 21 within days, at Defendant Adult Video Only, Inc. business location, with Defendants Michael
 22 J. Wright, and Linda M. Wright to also be present. On the day of the meeting, Plaintiff Levi
 23 Bussanich arrived at Defendant Adult Video Only, Inc.'s business location. He greeted
 24 Defendants Linda M. Wright, Michael J. Wright, and Daniel Cossette. Defendant Daniel
 25

1 Cossette and Defendant Michael J. Wright began the business meeting by giving Plaintiff Levi
 2 Bussanich a tour of Defendant Adult Video Only, Inc.

3 5.17 The two Defendants were extremely friendly and showed Plaintiff Levi
 4 Bussanich Defendant Adult Video Only, Inc.'s "Arcade." As background information relevant
 5 to this Complaint, in this industry, an "arcade" is an area inside an adult entertainment or
 6 novelty store where private booths are setup and maintained. Inside each booth are video
 7 monitors and a machine that accepts cash to view images, videos, or movies on monitors.
 8 Arcades tend to be highly profitable and a large source of cash for such businesses.
 9 Customers are attracted to arcades because of the privacy they offer and the fact the video
 10 or movies they watch for payment are not billed to them personally; rather, the customer
 11 can simply pay per use and there is no payment or billing evidence that they ever viewed the
 12 videos or movies.

14 5.18 Defendants Daniel Cossette, Donna Cossette, Linda M. Wright, and Michael J.
 15 Wright had setup and were running and maintaining approximately ten to fifteen arcade
 16 booths inside Defendant Adult Video Only, Inc.'s business location. Defendant Adult Video
 17 Only, Inc.'s machines only accepted cash. They did not accept credit or debit cards or any
 18 other type of payment. Defendant Daniel Cossette and Michael J. Wright gave Plaintiff Levi
 19 Bussanich a detailed tour of Defendant Adult Video Only, Inc.'s arcade system. They did so
 20 to help evaluate the value of the business so that in business negotiations an offer for the sale
 21 Defendant Adult Video Only, Inc. could be made. Defendants' businesses Adult Video Only,
 22 Inc., AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2 ran the same arcade system.

24 5.19 Defendant Daniel Cossette and Michael J. Wright gave Plaintiff Levi Bussanich
 25 a history of Defendant Adult Video Only, Inc. They did not mention they burned down

1 Plaintiff Levi Bussanich business, Plaintiff Desire Video, a couple years prior. When
 2 discussing Defendant Adult Video Only, Inc.'s arcade system, Defendant Daniel Cossette and
 3 Michael J. Wright revealed that Defendant Adult Video Only, Inc.'s arcade system was self-
 4 made, i.e., the computer system that operated the arcade was made by Defendants.
 5 Commercial units, such as "Videotel," an industry standard, are effective in keeping track off
 6 and logging how much money is generated by each unit while in use.

7 5.20 Plaintiff Levi Bussanich asked Defendant Daniel Cossette and Michael J. Wright
 8 how much revenue Defendant Adult Video Only, Inc.'s arcade system produced, and
 9 Defendant Daniel Cossette responded that Defendants Daniel Cossette, Donna Cossette,
 10 Michael J. Wright, and Linda M. Wright had developed their own operating system that was
 11 deliberately designed not to keep track of income, or the amount of money that customers
 12 inserted in the cash accepting machines. They further stated that "you know how it is, you
 13 gotta be careful in case the IRS comes around."

15 5.21 Defendants Daniel Cossette and Michael J. Wright admitted that Defendants
 16 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc.,
 17 The Bookstore, Inc., and AAV Ltd intentionally created, used, and maintained these self-made
 18 arcade systems and booths, which defrauded the Internal Revenue Service, since the 1970's
 19 and 1980's. Defendant Daniel Cossette described in detail how his early versions used 8mm
 20 film in a closed loop system to project the images onto a screen, instead of digital images on
 21 a monitor (which had not been invented yet), and that film versions were problematic, in
 22 terms of maintenance, because the rolls of films would break, unspool, and tangle during use.

24 5.22 The conversation regarding Defendants' Daniel Cossette, Donna Cossette,
 25 Michael J. Wright, Linda M. Wright, Adult Video Only, Inc., The Bookstore, Inc., and Defendant

1 AAV Ltd's fraudulent arcade system, in sum, was an admission that Defendants Daniel
2 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc., The
3 Bookstore, and AAV Ltd were intentionally defrauding the Internal Revenue Service and
4 perpetually committing acts of tax fraud, and money laundering, for their illegal racketeering
5 enterprise or association in fact since the 1970's and 1980's. Other acts by this illegal
6 racketeering enterprise or association in fact including acts of arson against Plaintiffs and
7 others, as well as illegally growing marijuana, and conspiring and/or soliciting acts of
8 extortion and/or murder as described herein.

9 5.23 One reason Defendants Daniel Cossette and Michael J. Wright bragged about
10 continually committing fraud was to demonstrate to Plaintiff Levi Bussanich that Defendant
11 Adult Video Only, Inc. made more money than an accounting of the business or tax records
12 would officially show. Therefore, Defendants Daniel Cossette, Donna Cossette, Michael J.
13 Wright, Linda M. Wright, Adult Video Only, Inc., and The Bookstore, Inc., and Defendant AAV
14 Ltd's could demand more money from Plaintiff Levi Bussanich.

16 5.24 Another reason Defendants Daniel Cossette and Michael J. Wright bragged
17 about continually committing fraud was to attempt to make Plaintiff Levi Bussanich trust
18 them. That way, if evidence of the Defendants committing arson against Plaintiff Levi
19 Bussanich ever came to light, Plaintiff Levi Bussanich would not suspect them as committing
20 the arson of Desire Video.

22 5.25 The cash-money generated by these arcade machines, fraudulently not
23 reported to the Internal Revenue Service, was used to pay the persons that burned down not
24 only Plaintiffs' business, but to pay for all wrongful and illegal acts committed by Defendants
25 as stated herein. This money, and these wrongful acts committed, crossed state lines.

1 5.26 Plaintiff Levi Bussanich was made to feel comfortable and believed Defendants
 2 Linda M. Wright, Michael J. Wright, Daniel Cossette, and Donna Cossette were sincere in their
 3 negotiations regarding the purchase of Defendant Adult Video Only, Inc. At no time did he
 4 suspect that these same Defendants had burned his business to the ground a couple years
 5 prior.

6 5.27 The negotiations for the sale of Adult Video Only, Inc. continued for
 7 approximately two more weeks. During which, Defendants Daniel Cossette, Donna Cossette,
 8 Michael J. Wright, Linda M. Wright told Plaintiff Levi Bussanich that they would sell all
 9 businesses these Defendants were officers for, and would not sell just Defendant Adult Video
 10 Only, Inc. These Defendants demanded millions of dollars for the sale of these businesses.

12 5.28 In the course of negotiations, Plaintiff Levi Bussanich learned that Defendants
 13 Adult Video Only, Inc., The Bookstore, Inc., and AAV Ltd were paying a much higher price for
 14 inventory then Plaintiffs, which impacted their profit margin such that Defendants had to
 15 charge customers far more, 15% to 20%, for products and services than Plaintiff Levi
 16 Bussanich's own businesses in the same industry. This was because Defendant Adult Video
 17 Only, Inc., The Bookstore, Inc., and AAV Ltd purchased their inventory through middlemen,
 18 distributors and/or wholesalers, while Plaintiffs' businesses were more business savvy and
 19 competitive by owning their own distribution company and warehouses for extra inventory.
 20 This allowed Plaintiffs to dramatically reduce prices, far below, what Defendants Adult
 21 Video Only, Inc., The Bookstore, Inc., and AAV Ltd were or could charge to remain profitable
 22 because Plaintiffs, essentially, had no middlemen to pay for inventory, such as videos,
 23 movies, and novelty products.

25 5.29 In hindsight, it is obvious that Defendants Daniel Cossette, Donna Cossette,

1 Michael J. Wright, Linda M. Wright, Adult Video Only, Inc., The Bookstore, Inc., AAV Ltd
2 defrauded the Internal Revenue Service, burnt down Plaintiffs' business, as well as
3 attempted to do so to others, grew marijuana illegally, and committed all acts as stated
4 herein, repeatedly over the course of decades, as a part of their illegal racketeering
5 enterprise or association in fact to destroy competition and attempt to monopolize profits
6 and industry.

7 5.30 In the course of these continued negotiations, Plaintiff Levi Bussanich visited
8 more of Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright's
9 business locations and met with Defendants multiple times. One of the locations, was on
10 181st street in Portland, Oregon, and another was in the "China Town" area of Portland,
11 Oregon.

13 5.31 The China Town location had numerous fire code problems and violations.
14 Concealing, from Plaintiffs, the fact that Defendants had burned down Plaintiffs' business
15 was important to Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M.
16 Wright, Adult Video Only, Inc., The Bookstore, Inc., Defendant AAV Ltd because if they could
17 sell that location to Plaintiffs then Defendants Daniel Cossette, Donna Cossette, Michael J.
18 Wright, Linda M. Wright, Adult Video Only, Inc., The Bookstore, Inc., AAV Ltd could effectively
19 pawn those fire code problems and violations off on Plaintiffs.

20 5.32 In sum, this affirmative conduct and these affirmative acts by Defendants
21 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc.,
22 The Bookstore, Inc., AAV Ltd led Plaintiffs to believe that these Defendants had nothing to do
23 with destruction of his business and property. It also invited and induced Plaintiff to not
24 only believe that he had no claim against them or the businesses they were officers for, but

1 led Plaintiff to delay commencing this suit. During said business dealings said Defendants
 2 concealed necessary facts from Plaintiffs, which induced Plaintiff to not suspect or bring suit
 3 against them.

4 5.33 Also in 2006, law enforcement's confidential investigation revealed Ken
 5 Courtney had numerous meetings with Defendant Mark Fuston. These meetings began
 6 linking Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright
 7 with Defendant Mark Fuston to the arson of Desire Video and previous arsons to the adult
 8 novelty/retail businesses referenced above.

9 5.34 By February of 2007, Ken Courtney, working as a confidential informant, had
 10 identified a felon, Mike Allison, who had also worked for Defendants Daniel Cossette, Donna
 11 Cossette, Michael J. Wright, and Linda M. Wright at their rival novelty businesses, Defendants
 12 The Bookstore, Inc., Adult Video Only, Inc., and AAV Ltd. Ken Courtney identified Mike Allison
 13 as a person hired by Defendants, acting in their personal and official capacities and for the
 14 racketeering enterprise or association in fact, Daniel Cossette, Donna Cossette, Michael J.
 15 Wright, and Linda M. Wright, to commit arson on other buildings and businesses, with the
 16 goal of eliminating competition against Defendants The Bookstore, Inc., Adult Video Only,
 17 Inc., AAV Ltd. (See Attachment 3). The investigation also revealed Defendants Daniel
 18 Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright were planning more arsons
 19 as well as conspiring and/or soliciting to murder Plaintiff Levi Bussanich, to eliminate him
 20 and his business as competition. (See Attachment 3).

21 5.35 At this same time, Ken Courtney detailed illegal marijuana grow operations
 22 that Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright
 23 were involved in. (See Attachment 3).

1 5.36 Unfortunately, the confidential ATF and law enforcement investigation into
 2 Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright fizzled
 3 and came to a near halt when Ken Courtney met with Defendant Daniel Cossette, Donna
 4 Cossette, Michael J. Wright, or Linda M. Wright and then shortly thereafter allegedly
 5 committed suicide. (See Attachment 3).

6 5.37 The close temporal connection between Ken Courtney's death and meeting
 7 with Defendant Daniel Cossette, Donna Cossette, Michael J. Wright, or Linda M. Wright is a
 8 suspicious circumstance given that Ken Courtney was implicating those Defendants in
 9 serious felonies. (See Attachment 3).

10 5.38 Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, and Linda M.
 11 Wright, The Bookstore, Inc., Adult Video Only, Inc., and AAV Ltd. took action to hide their
 12 crimes of arson, terror, and soliciting to take Plaintiff Levi Bussanich's life because they
 13 learned that their plans had been discovered by law enforcement and because Plaintiff Levi
 14 Bussanich was negotiating with them for the sale of their businesses. One thing they did was
 15 create Defendant the Bookstore, Inc.-2 in 2008 to attempt to prevent liability from attaching
 16 to their personal and corporate income and property.

17 5.39 Years later, at some, yet, unknown point, the ATF investigation into
 18 Defendants came back to life. Plaintiffs have diligently pursued the cause of this rekindled
 19 investigation. (See Attachment 5, Freedom of Information Act Request (hereby incorporated
 20 by reference and attached to this Complaint)). However, without this Complaint being filed
 21 and discovery powers implemented their pursuit has been limited.

22 5.40 Defendant Mark Fuston was then indicted in the spring of 2013. He confessed
 23 his crimes, including the arson of Desire Video, and that he was hired by Defendants Daniel

1 Cossette, Donna Cossette, Michael J. Wright, and Linda M. Wright, who had full knowledge of
 2 his crimes, for the benefit of themselves and Defendants Adult Video Only, Inc., The
 3 Bookstore, Inc., and AAV Ltd, the unlawful racketeering enterprise or association in fact.
 4 Defendant Mark Fuston was sentenced to prison, via a plea deal, and wrote a letter
 5 confessing his crimes that implicate Defendants Daniel Cossette, Donna Cossette, Michael J.
 6 Wright, Linda M. Wright, Adult Video Only, Inc., The Bookstore, Inc., AAV Ltd, and the
 7 unlawful racketeering enterprise or association in fact. (See Attachment 6, Letter from Mark
 8 Fuston (hereby incorporated by reference and attached to this Complaint).
 9

10 5.41 At all times Plaintiffs' diligently worked with law enforcement but were not
 11 privy to the confidential investigation going forward regarding the burning of Desire Video.
 12 At no time did Plaintiffs have the requisite knowledge to bring any cause of action against
 13 any of the named Defendants in this Complaint.

14 5.42 In sum, because of the extraordinary facts of this case, Plaintiffs' claims are
 15 timely under principals of accrual in this Circuit and/or Plaintiffs' claims are timely because
 16 of the doctrines of equitable tolling and/or estoppel.

17 **VI. Additional Factual Allegations Supporting All RICO Claims**

18 6.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
 19 every allegation of the above paragraphs.

20 6.2 RICO violations prohibit the following four types of activities: Section 1962(a)
 21 prohibits a person from investing in an enterprise any income derived from a pattern of
 22 racketeering activity. Section 1962(b) prohibits a person from using a pattern of
 23 racketeering activity, or the collection of unlawful debt, to acquire or maintain control of an
 24 enterprise. Section 1962(c) prohibits a person from conducting the affairs of an enterprise
 25

1 through a pattern of racketeering, or the collection of an unlawful debt. And section 1962(d)
2 prohibits a person from conspiring to violate Section 1962(a), (b), or (c). Defendants have
3 violated each of these sections, as detailed below.

4 6.3 While RICO claims are case specific, all of the above sections have in common
5 the following necessary elements: (1) a culpable person, who (2) willfully or knowingly, (3)
6 commits or conspires to the commission of racketeering activity, (4) through a pattern, (5)
7 involving a separate enterprise or association in fact that, (6) effect interstate commerce.
8 The collection of an unlawful debt is itself a RICO violation even without the element of a
9 pattern of racketeering activity. Arson is a racketeering activity. Fraud is a racketeering
10 activity. Illegal growing and selling of controlled substance is a racketeering activity. Money
11 laundering is a racketeering activity. A continuous pattern of racketeering is satisfied by
12 demonstrating two or more racketeering acts were pursued in the same overarching
13 scheme. When there is more than one scheme, more than one predicate act, more than one
14 victim, and a variety of injuries over time—liability under RICO is conclusively established.
15 Defendants as described below meet all of these elements.

16 6.4 Culpable Persons. Defendant Adult Video Only, Inc., Defendant AAV Ltd,
17 Defendant The Bookstore, Inc., Defendant The Bookstore, Inc.-2, Defendant Cossette and
18 Wright Partnership, Defendant Daniel Cossette, Defendant Donna Cossette, Defendant
19 Michael J. Wright, Defendant Linda M. Wright, Defendant Mark Fuston, and Defendant
20 Jeremy Coughlin willfully and with knowledge of the enterprise or association in fact's
21 unlawful and wrongful racketeering actions, directly and proximately, caused injury to
22 Plaintiff Levi Bussanich's person and Plaintiffs' business and property.

23 6.5 Enterprise or Association-in-Fact. Defendants Adult Video Only, Inc., AAV Ltd,

1 The Bookstore, Inc., The Bookstore, Inc.-2, Cossette and Wright Partnership, Daniel Cossette,
2 Donna Cossette, Michael J. Wright, Linda M. Wright, Mark Fuston, and Jeremy Coughlin form
3 an unlawful racketeering enterprise or association-in-fact.

4 6.5.1 This group of Defendants has hierarchy. For example, Defendant
5 Cossette and Wright Partnership, Defendant Daniel Cossette, Defendant Donna Cossette,
6 Defendant Michael J. Wright, Defendant Linda M. Wright, in their individual and official
7 capacities, worked with Defendant Mark Fuston and Defendant Jeremy Coughlin to commit
8 acts, as alleged herein. Defendants Mark Fuston and Jeremy Coughlin participated and
9 engaged in and also managed the illegal wrongful acts and affairs, as stated herein, of the
10 racketeering enterprise or association in fact.

11 6.5.2 All Defendants, including Defendants Defendant Adult Video Only, Inc.,
12 Defendant AAV Ltd, Defendant The Bookstore, Inc., Defendant The Bookstore, Inc.-2, and
13 Defendant Cossette and Wright Partnership had independent interests and were free to act
14 and advance its own interests contrary to the other members of the enterprise. All
15 Defendants are culpable for their actions, as persons, and are also culpable as part of the
16 racketeering enterprise or association in fact.

17 6.5.3 This group of Defendants also has structure. For example, Defendant
18 Adult Video Only, Inc., Defendant AAV Ltd, Defendant The Bookstore, Inc., Defendant The
19 Bookstore, Inc.-2 financed the racketeering or association in fact's unlawful and wrongful
20 acts. Defendants, in their individual and official capacities, Daniel Cossette, Donna Cossette,
21 Michael J. Wright, Linda M. Wright, Mark Fuston, and Jeremy Coughlin were decision
22 makers and managed and operated the affairs of the racketeering enterprise or association
23 in fact. Defendants Mark Fuston and Jeremy Coughlin were, additionally, in charge of
24
25

1 and/or hired and/or directed to carry out unlawful and illegal acts. Defendant The
2 Bookstore, Inc.-2, Defendant Cossette and Wright Partnership laundered money, profits, and
3 property, committed tax fraud, and expressly covered up the unlawful and wrongful acts of
4 the racketeering enterprise or association in fact.

5 6.6 Interstate Commerce. Plaintiffs Levi Bussanich is a Washington State resident
6 and Desire NW, Inc. is a Washington State Corporation. Defendants that form this association
7 in fact or enterprise, as stated herein, are Oregon and Washington state businesses and/or
8 residents that engaged in unlawful and wrongful and illegal racketeering activity, as stated
9 herein, that crossed state lines and affected interstate commerce. Defendants engage in the
10 distribution, sale, and/or acquisition of goods and services that cross state lines. Defendants
11 manage and control the affairs of the racketeering enterprise or association in fact.

12 6.7 Predicate Acts.

14 6.7.1 During the 1970's, 1980's, 1990's, and 2000's money laundering and
15 tax fraud via self-made "arcade" systems specifically designed to accept cash and not track
16 money and income generated. Falsification of income tax statements during these same time
17 periods also occurred. Defendants, in their personal and official capacity and in control of
18 and managing the association in fact, made these admissions to Plaintiff Levi Bussanich
19 during 2006, as stated herein. Laundered money was used to create, maintain, fund, and
20 control business entities and corporations, as stated herein, i.e., Defendants The Bookstore,
21 Inc.-2, Cossette and Wright Partnership.

23 6.7.2 The 1977 Attempted arson in Spokane Washington of another
24 competing Adult Video Retailer. Defendant Mark D. Fuston admitted during an ATF
25 recording that he was hired for that job by Defendants Daniel Cossette and Michael J. Wright

1 acting in their personal and official capacity and in control of and managing the association
2 in fact.

3 6.7.3 Defendant Mark D. Fuston admitted that he was hired in 1991 by
4 Defendants Daniel Cossette and Michael J. Wright, in their personal and official capacity and
5 in control of and managing the association in fact, to place a pipe bomb in the Hart's Movie
6 Arcade in Portland Oregon. Hart's Movie Arcade is located near a location owned and
7 operated by Defendants.

8 6.7.4 In 2003, Defendant Mark D. Fuston was hired by Defendants, as stated
9 herein, acting in their personal and official capacity and in control of and managing the
10 association in fact, to burn down Desire Video.

11 6.7.5 In 2005, Mark D. Fuston was solicited, as stated herein, by Defendants
12 Daniel Cossette and Michael J. Wright, acting in their personal and official capacity and in
13 control of and managing the association in fact, to take Plaintiff Levi Bussanich's life and
14 throw hand grenades into Plaintiffs business, the newly rebuilt Desire Video. All Defendants
15 either had knowledge of or willfully conspired to carry out this murder.

16 6.7.6 As stated herein, Defendants Daniel Cossette and Michael J. Wright,
17 acting in their personal and official capacity and in control of and managing the association
18 in fact managed and controlled an illegal marijuana grow and sale operation.

19 6.8 Pattern of Racketeering. The acts stated herein by the enterprise or
20 association in fact constitute a pattern of unlawful racketeering. These acts are related
21 because they are all actions made under the authority of, control of, and by the same named
22 Defendants and participants. Moreover, the victims, e.g., Plaintiffs or those in the same line
23 of business, were in the same or very similar line of work and in competition with

1 Defendants. The results of the acts were also similar in that the government was defrauded,
2 businesses were or attempted to be burned or destroyed, money was laundered, and persons
3 were or were threatened to be harmed. The acts extend over a substantial period of time.
4 The motive for carrying out these acts was economic in nature, i.e., to defraud the
5 government, launder money, and monopolize commercial activity over state lines to injury
6 of Plaintiffs. The scheme or multiple schemes by the enterprise or association in fact had the
7 same, above stated, motive and goals to defraud the government, launder money, and
8 monopolize, the same or similar, commercial activity over state lines. These acts are
9 continuous because, as stated herein, they occurred over decades with no break in activity.
10

11 6.9 Actions are Open-Ended and Will Be Repeated. Defendants' acts are open-
12 ended as their past conduct by its nature projects into the future substantial threat that
13 further acts will be repeated. This is because, for example, the methods chosen by Defendants
14 has remained consistent and because Defendants still own, operate, and control businesses
15 that will repeat these acts unless stopped. The number of predicate acts demonstrate further
16 acts will be repeated. The methods, as stated herein, such as defrauding the government
17 with tax fraud, are institutionalized in Defendants' businesses and further acts will be
18 repeated.
19

20 6.10 Injury to Plaintiffs and Standing under Section 1962(a)(investment of
21 racketeering income). By reason of Defendants, in their personal and official capacities,
22 illegally and wrongfully, as stated herein, investing monies and income derived from a
23 pattern of racketeering activity, e.g., tax fraud, arson, illegal marijuana grow operations,
24 attempting to monopolize commercial activities/industry, Plaintiffs sustain injury by the
25 destruction of Plaintiff's property, e.g., Desire Video, and harm done to Plaintiff Levi

1 Bussanich personally, e.g., mental anguish, and to Plaintiffs' business operations and
2 profitability.

3 6.11 Injury to Plaintiffs and Standing under Section 1962(b)(acquisition of an
4 interest or control over an enterprise). By reason of Defendants, in their personal and official
5 capacities, illegally and wrongfully, as stated herein, acquiring interest and control over an
6 unlawful enterprise or association in fact through a pattern of racketeering, e.g., maintaining
7 businesses that engage unlawful racketeering, fraudulently obtained income via cheating the
8 IRS and then using the income to maintain and control the enterprise or association in fact,
9 growing illegal marijuana and then using the income to maintain and control the enterprise
10 or association in fact, Plaintiffs sustained injury by the destruction of Plaintiff's property, e.g.,
11 Desire Video, and harm done to Plaintiff Levi Bussanich personally, e.g., mental anguish, and
12 to Plaintiffs' business operations and profitability.

14 6.12 Injury to Plaintiffs and Standing under Section 1962(c)(conducting the affairs
15 of an enterprise and unlawful debt collection). By reason of Defendants, in their personal and
16 official capacities, illegally and wrongfully, as stated herein, conducting the affairs of and
17 collected unlawful debts of the unlawful enterprise or association in fact through a pattern
18 of racketeering, e.g., solicited or attempted: arson, tax fraud, or murder, monopolizing of
19 industry, money laundering, collection of monies paid for such acts, Plaintiffs sustained
20 injury by the destruction of property, e.g., Desire Video, and harm done to Plaintiff Levi
21 Bussanich personally, e.g., mental anguish, and to Plaintiffs' business operations and
22 profitability.

24 6.13 Injury to Plaintiffs and Standing under Section 1962(d)(injury by overt acts
25 committed in furtherance of the conspiracy). By reason of Defendants, in their personal and

1 official capacities, illegally and wrongfully, as stated herein, conspiring to all act, as stated
2 herein, through a pattern of racketeering, sustained injury by the destruction of Plaintiff's
3 property, e.g., Desire Video, and harm done to Plaintiff Levi Bussanich personally, e.g., mental
4 anguish, and to Plaintiffs' business operations and profitability.

5 **VII. Defendants' Acts are Open-Ended as Past Conduct by Its Nature Projects
6 into the Future Substantial Threat of Repetition.**

7.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
8 every allegation of the above paragraphs.

9.2 Defendants' acts, transactions, conspiracies, omissions, and schemes
10 separated by time and space are open-ended and there is a substantial threat that
11 Defendants will continue their illegal and wrongful conduct in the future.

12 **VIII. Additional Facts Supporting Piercing the Corporate Veil.**

13.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
14 every allegation of the above paragraphs.

15.2 Defendant Adult Video Only has corporate officers that participated in the
16 wrongful and illegal acts herein, including being involved in the racketeering or association
17 in fact that has harmed Plaintiffs. These corporate officers include Defendant Linda M.
18 Wright and Defendant Michael J. Wright. Each had knowledge of, participated in, and
19 approved of the wrongful conduct described herein and under the doctrine of piercing the
20 corporate veil each is personally liable for the penalties of such wrongful conduct.

22.3 Defendant AAV Ltd. has corporate officers that participated in the wrongful
23 and illegal acts herein, including being involved in the racketeering or association in fact that
24 has harmed Plaintiffs. These corporate officers include Defendant Daniel L. Cossette and

1 Defendant Donna L. Cossette. Each had knowledge of, participated in, and approved of the
2 wrongful conduct described herein and under the doctrine of piercing the corporate veil
3 each is personally liable for the penalties of such wrongful conduct.

4 8.4 Defendant The Bookstore, Inc. has corporate officers that participated in the
5 wrongful and illegal acts herein, including being involved in the racketeering or association
6 in fact that has harmed Plaintiffs. These corporate officers include Defendant Linda M.
7 Wright and Defendant Michael J. Wright. Each had knowledge of, participated in, and
8 approved of the wrongful conduct described herein and under the doctrine of piercing the
9 corporate veil each is personally liable for the penalties of such wrongful conduct.

10 8.5 Defendant The Bookstore, Inc.-2 has corporate officers that participated in the
11 wrongful and illegal acts herein, including being involved in the racketeering or association
12 in fact that has harmed Plaintiffs. These corporate officers include Defendant Linda M.
13 Wright, Defendant Michael J. Wright, Defendant Daniel Cossette, and Defendant Donna
14 Cossette. Each had knowledge of, participated in, and approved of the wrongful conduct
15 described herein and under the doctrine of piercing the corporate veil each is personally
16 liable for the penalties of such wrongful conduct.

18 8.5.1 In addition, The Bookstore, Inc.-2 was formed in 2008 in an express
19 attempt to prevent liability from attaching to it and its corporate officers for the wrongful
20 and illegal acts herein, including being involved in the racketeering or association in fact that
21 has harmed Plaintiffs. Income and money derived from the pattern of racketeering activity
22 described herein was used to form this corporation, pay its corporate officers, and invest in
23 and support the unlawful racketeering enterprise or association in fact. The pattern of
24 racketeering activity was used to acquire and maintain this corporation. Under law and the

1 doctrine of piercing the corporate veil corporate each of this Defendant's corporate officers
2 as well as the corporation itself is liable, personally or otherwise, for the penalties of such
3 wrongful conduct.

4 8.6 Defendant Cossette and Wright Partnership has partners/corporate officers
5 that participated in the wrongful and illegal acts herein, including being involved in the
6 racketeering or association in fact that has harmed Plaintiffs. These partners/corporate
7 officers include Defendant Linda M. Wright, Defendant Michael J. Wright, Defendant Daniel
8 Cossette, and Defendant Donna Cossette. Each had knowledge of, participated in, and
9 approved of the wrongful conduct described herein and under the doctrine of piercing the
10 corporate veil each is personally liable for the penalties of such wrongful conduct.

11 8.6.1 In addition, Defendant Cossette and Wright Partnership was formed in
12 1995 in an express to attempt prevent liability from attaching to it and its
13 partners/corporate officers for the wrongful and illegal acts herein, including being involved
14 in the racketeering or association in fact that has harmed Plaintiffs. Income and money
15 derived from the pattern of racketeering activity described herein was used to form this
16 partnership/corporation, pay its corporate officers, and invest in and support the unlawful
17 racketeering enterprise or association in fact. The pattern of racketeering activity was used
18 to acquire and maintain this partnership/corporation. Under law and the doctrine of
19 piercing the corporate veil each of this Defendant's partners/corporate officers as well as the
20 partnership/company itself is liable, personally or otherwise, for the penalties of such
21 wrongful conduct.

22 **IX. FIRST CAUSE OF ACTION: RICO SECTION 1962(a).**

23 9.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and

1 every allegation of the above paragraphs.
2

3 9.2 This Count is against Defendants Adult Video Only, Inc., AAV Ltd, The
4 Bookstore, Inc., The Bookstore, Inc.-2, Cossette and Wright Partnership, Daniel Cossette,
5 Donna Cossette, Michael J. Wright, and Linda M. Wright, in their individual and official
capacities ("Section 1962(a) Defendants").
6

7 9.3 The enterprise or association-in-fact engaged in and whose activities affect
interstate commerce. Section 1962(a) Defendants are employed by or associated with the
8 enterprise. All actions were done intentionally, willfully, and with knowledge of their
9 wrongful and illegal nature.
10

11 9.4 The Section 1962(a) Defendants used and invested income and monies that
was derived from a pattern of racketeering activity. Defendants Daniel Cossette, Donna
12 Cossette, Michael J. Wright, and Linda M. Wright, Adult Video Only, Inc., AAV Ltd, and The
13 Bookstore, Inc. profitably engaged in a pattern of racketeering activity and the used and
14 invested that money to create new business venture, e.g., (Defendants) The Bookstore, Inc.-
15 2 and launder illegal monies and profits. Additionally, Section 1962(a) Defendants used and
16 invested income from a pattern of racketeering activity to illegally create, maintain, and to
17 operate an illegal marijuana business, growing and selling marijuana.
18

19 9.5 The racketeering activity above constitutes a pattern of racketeering activity
20 pursuant to 18 U.S.C. § 1961(5).
21

22 9.6 The Section 1962(a) Defendants used and invested income and monies that
was derived from a pattern of racketeering activity described above, in violation of 18 U.S.C.
23 § 1962(b).
24

25 9.7 As a direct and proximate result of Section 1962(a) Defendants' racketeering

1 activities and violations of 18 U.S.C. § 1962(a), Plaintiffs have been injured in their business
 2 and property in that, for example, Plaintiffs' business operations, competitiveness, and
 3 profitability were compromised by the funding of Defendants' businesses, illegal or
 4 otherwise.

5 9.8 Section 1962(a) Defendants, in their individual and official capacities, Daniel
 6 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
 7 employees and/or agents who participated in arson and other acts set forth herein, under
 8 the doctrine of *respondeat superior*.

9 9.9 The doctrine of piercing the corporate veil is appropriate against Section
 10 1962(a) Defendant corporate officers and corporate Defendants, as stated herein, because
 11 each Section 1962(a) Defendant had knowledge of, participated in, and approved of the
 12 wrongful conduct described herein.

14 9.10 The injuries to Plaintiffs were directly and proximately caused by Section
 15 1962(a) Defendants and by virtue of violations to 18 U.S.C. § 1962(a), Section 1962(a)
 16 Defendants are liable to Plaintiffs for three times the damages the Plaintiffs have sustained,
 17 plus the cost of this suit, including reasonable attorney fees.

18 **X. SECOND CAUSE OF ACTION: RICO SECTION 1962(b)**

19 10.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
 20 every allegation of the above paragraphs.

22 10.2 This Count is against Defendants, in their individual and official capacities,
 23 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc.,
 24 Mark Fuston, Jeremy Coughlin, AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, and
 25 Cossette and Wright Partnership ("Section 1962(b) Defendants").

1 10.3 The enterprise or association-in-fact engaged in and whose activities effect
 2 interstate commerce. Section 1962(b) Defendants are employed by or associated with the
 3 enterprise.

4 10.4 The Section 1962(b) Defendants acquired and maintained interest in and
 5 control of the enterprise through a pattern of racketeering activity. Daniel Cossette, Donna
 6 Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc., Mark Fuston, Jeremy
 7 Coughlin, AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, and Cossette and Wright
 8 Partnership repeatedly supported, preserved, kept effective, continued, controlled,
 9 regulated, directed, and managed property of the enterprise or association in fact.
 10 Additionally, Section 1962(b) Defendants through a pattern of racketeering activity collected
 11 unlawful debts including, for example, the monies charged and collected for the acts of arson
 12 and illegal marijuana growing and selling, as stated herein.

14 10.5 The racketeering activity above constitutes a pattern of racketeering activity
 15 pursuant to 18 U.S.C. § 1961(5).

16 10.6 The Section 1962(b) Defendants have directly and indirectly acquired and
 17 maintained interests in and control of the enterprise through the pattern of racketeering
 18 activity described above, in violation of 18 U.S.C. § 1962(b).

20 10.7 As a direct and proximate result of Section 1962(b) Defendants' racketeering
 21 activities and violations of 18 U.S.C. § 1962(b), Plaintiffs have been injured in their business
 22 and property in that, for example, Plaintiffs' business operations, competitiveness, and
 23 profitability were compromised by the funding of Defendants' businesses, illegal or
 24 otherwise.

25 10.8 Section 1962(b) Defendants, in their individual and official capacities, Daniel

1 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
 2 employees and/or agents who participated in arson and other acts set forth herein, under
 3 the doctrine of *respondeat superior*.

4 10.9 The doctrine of piercing the corporate veil is appropriate against Section
 5 1962(b) Defendant corporate officers and corporate Defendants, as stated herein, because
 6 each Section 1962(b) Defendant had knowledge of, participated in, and approved on the
 7 wrongful conduct described herein.

8 10.10 The injuries to Plaintiffs were directly and proximately caused by Section
 9 1962(b) Defendants and by virtue of violations to 18 U.S.C. § 1962(b), Section 1962(b)
 10 Defendants are liable to Plaintiffs for three times the damages the Plaintiffs have sustained,
 11 plus the cost of this suit, including reasonable attorney fees.

13 **XI. THIRD CAUSE OF ACTION: RICO SECTION 1962(c)**

14 11.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
 15 every allegation of the above paragraphs.

16 11.2 This Count is against Defendants, in their individual and official capacities,
 17 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc.,
 18 Mark Fuston, Jeremy Coughlin, AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, and
 19 Cossette and Wright Partnership ("Section 1962(c) Defendants").

20 11.3 The enterprise or association-in-fact engaged in and whose activities effect
 21 interstate commerce. Section 1962(c) Defendants are employed by or associated with the
 22 enterprise.

24 11.4 Section 1962(c) Defendants agreed to and did conduct and participate in the
 25 conduct of the enterprise's affairs through a pattern of racketeering activity and for the

1 unlawful purpose of intentionally defrauding Plaintiffs. Section 1962(c) Defendants Daniel
 2 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc., Mark
 3 Fuston, Jeremy Coughlin, AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, and Cossette
 4 and Wright Partnership repeatedly committed acts of arson, tax fraud, unlawful debt
 5 collection, money laundering, illegal marijuana growing and selling, solicitation for murder
 6 for hire, terror, assault, and concealment of all of the above illegal and wrongful acts, as
 7 stated herein.

8 11.5 Pursuant and in furtherance of their fraudulent scheme, Section 1962(c)
 9 Defendants committed multiple related acts of racketeering, as stated herein.

10 11.6 Section 1962(c) Defendants have directly and indirectly conducted and
 11 participated in the conduct of the enterprise's affairs through the pattern of racketeering and
 12 activity described above, in violation of 18 U.S.C. § 1962(c).

13 11.7 As a direct and proximate result of the Section 1962(c) Defendants'
 14 racketeering activities and violations of 18 U.S.C. § 1962(c), Plaintiffs have been injured in
 15 their business and property. Plaintiffs' business, Desire Video, was trespassed upon and was
 16 burned to the ground. Plaintiffs' business operations, competitiveness, and profitability were
 17 compromised by the funding of Defendants' businesses, illegal or otherwise. Plaintiff Levi
 18 Bussanich livelihood and businesses were harmed. His life was solicited to be taken for
 19 money by Section 1962(c) Defendants. He has suffered immeasurable mental anguish.

20 11.8 Section 1962(c) Defendants, in their individual and official capacities, Daniel
 21 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
 22 employees and/or agents who participated in arson and other acts set forth herein, under
 23 the doctrine of *respondeat superior*.

1 11.9 The doctrine of piercing the corporate the veil is appropriate against Section
 2 1962(c) Defendant corporate officers and corporate Defendants, as stated herein, because
 3 each Section 1962(c) Defendant had knowledge of, participated in, and approved of the
 4 wrongful conduct described herein.

5 11.10 The injuries to Plaintiffs were directly and proximately caused by Section
 6 1962(c) Defendants and by virtue of violations to 18 U.S.C. § 1962(c), Section 1962(c)
 7 Defendants are liable to Plaintiffs for three times the damages the Plaintiffs have sustained,
 8 plus the cost of this suit, including reasonable attorney fees.

9 **XII. FOURTH CAUSE OF ACTION: RICO SECTION 1962(d)**

10 12.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
 11 every allegation of the above paragraphs.

12 12.2 This Count is against Defendants Daniel Cossette, Donna Cossette, Michael J.
 13 Wright, Linda M. Wright Adult Video Only, Inc., Mark Fuston, Jeremy Coughlin, AAV Ltd, The
 14 Bookstore, Inc., The Bookstore, Inc.-2, and Cossette and Wright Partnership ("Section
 15 1962(d) Defendants").

16 12.3 As set forth above, the Section 1962(d) Defendants agreed and conspired to
 17 violate 18 U.S.C. §§ 1962 (a), (b), and (c). Defendants Daniel Cossette, Donna Cossette,
 18 Michael J. Wright, Linda M. Wright, Adult Video Only, Inc., Mark Fuston, Jeremy Coughlin,
 19 AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, and Cossette and Wright Partnership
 20 conspired to invest monies and property, acquired, maintained, and controlled interests, and
 21 agreed to and conducted acts of racketeering enterprise or association in fact, as stated
 22 herein. Conspiracies included, for example, acts of arson, tax fraud, unlawful debt collection,
 23 illegal marijuana growing and selling, solicitation for murder for hire, terror, assault,

1 unlawful monopolizing of industry and business, fraudulently creating new corporations and
2 business to launder monies, and concealment of all of the above illegal and wrongful acts.

3 12.4 Section 1962(d) Defendants have intentionally conspired and agreed to
4 acquire or maintain interests in the enterprise through a pattern of racketeering activity, and
5 conduct and participate in the conduct of the affairs of the enterprise through a pattern of
6 racketeering activity. Section 1962(d) Defendants knew that their predicate acts were part
7 of a pattern of racketeering activity and agreed to the commission of those acts to further the
8 schemes described above. That conduct constitutes a conspiracy to violate 18 U.S.C. §§
9 1962(b) and (c), in violation of 18 U.S.C. § 1962(d).

10 12.5 As a direct and proximate result of the Section 1962(d) Defendants'
11 conspiracy, the overt acts taken in furtherance of that conspiracy, and violations of 18 U.S.C.
12 § 1962(d), Plaintiffs have been injured in their business and property. Plaintiffs' business,
13 Desire Video, was trespassed upon and was burned to the ground. Plaintiffs' business
14 operations, competitiveness, and profitability were compromised by the funding of
15 Defendants' businesses, illegal or otherwise. Plaintiff Levi Bussanich livelihood and
16 businesses were harmed. His life was solicited to be taken for money by Section 1962(d)
17 Defendants. He has suffered immeasurable mental anguish.

18 12.6 Section 1962(d) Defendants, in their individual and official capacities, Daniel
19 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
20 employees and/or agents who participated in arson and other acts set forth herein, under
21 the doctrine of *respondeat superior*.

22 12.7 The doctrine of piercing the corporate veil is appropriate against Section
23 1962(d) Defendant corporate officers and corporate Defendants, as stated herein, because

1 each Section 1962(d) Defendant had knowledge of, participated in, and approved of the
 2 wrongful conduct described herein.

3 12.8 The injuries to Plaintiffs were directly and proximately caused by Section
 4 1962(d) Defendants and by virtue of violations to 18 U.S.C. § 1962(d), Section 1962(d)
 5 Defendants are liable to Plaintiffs for three time the damages the Plaintiffs have sustained,
 6 plus the cost of this suit, including reasonable attorney fees.

7 **XIII. FIFTH CAUSE OF ACTION: VIOLATION OF RCW 9A.82.100 AND RCW
 8 9A.82.080; CRIMINAL PROFITEERING THAT IS A PART OF A PATTERN OF
 9 CRIMINAL PROFITEERING ACTIVITY.**

10 13.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
 11 every allegation of the above paragraphs.

12 13.2 This Count is against Defendants, in their individual and official capacities,
 13 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc.,
 14 Mark Fuston, Jeremy Coughlin, AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, and
 15 Cossette and Wright Partnership ("RCW 9A.82.080 Defendants").

16 13.3 As set forth above, RCW 9A.82.080 Defendants agreed and conspired to
 17 violations RCW 9A.82.100 and RCW 9A.82.080. RCW 9A.82.080 Defendants, knowingly
 18 received and conspired/attempted to receive proceeds to use and/or invest derived from
 19 criminal profiteering activity in violation of RCW 9A.82.080(1)(a) and RCW 9A.82.080(3)(a).
 20 They knowingly acquired and conspired/attempted to maintain interest and/or control of
 21 an unlawful enterprise through a pattern of criminal profiteering activity in violation of RCW
 22 9A.82.080(2)(a) and RCW 9A.82.080(3)(a).

23 13.4 RCW 9A.82.080 Defendants knew their acts and/or conspiracy constituted a
 24 pattern of criminal profiteering activity in violation of RCW 9A.82.080(1)(a), RCW

1 9A.82.080(2)(a), and RCW 9A.82.080(3)(a).

2 13.5 As a direct and proximate result of the RCW 9A.82.080 Defendants' acts
3 and/or conspiracy, the overt acts taken in furtherance of that conspiracy, and violations RCW
4 9A.82.080(1)(a), RCW 9A.82.080(2)(a), and RCW 9A.82.080(3)(a), Plaintiffs' business,
5 Desire Video, was trespassed upon and was burned to the ground. Plaintiffs' business
6 operations, competitiveness, and profitability were compromised by the funding of
7 Defendants' businesses, illegal or otherwise. Plaintiff Levi Bussanich life livelihood, and
8 businesses, were harmed. His life was solicited to be taken for money by RCW 9A.82.080
9 Defendants. He has suffered immeasurable mental anguish.

10 13.6 RCW 9A.82.080 Defendants, in their individual and official capacities, Daniel
11 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
12 employees and/or agents who participated in arson and other acts set forth herein, under
13 the doctrine of *respondeat superior*.

14 13.7 The doctrine of piercing the corporate veil is appropriate against RCW
15 9A.82.080 Defendant corporate officers and corporate Defendants, as stated herein, because
16 each RCW 9A.82.080 Defendant had knowledge of, participated in, and approved of the
17 wrongful conduct described herein.

18 13.8 The injuries to Plaintiffs were directly and proximately caused by RCW
19 9A.82.060 Defendant and by virtue of violations to RCW 9A.82.080(1)(a), RCW
20 9A.82.080(2)(a), and RCW 9A.82.080(3)(a), RCW 9A.82.080 Defendants are liable to
21 Plaintiffs for three time the damages the Plaintiffs have sustained, plus the cost of this suit,
22 including reasonable attorney fees.

1 **XIV. SIXTH CAUSE OF ACTION: VIOLATION OF RCW 9A.82.100 AND 9A.82.060;**
 2 **CRIMINAL PROFITEERING THAT INVOLVES LEADING ORGANIZED CRIME**

3 14.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
 4 every allegation of the above paragraphs.

5 14.2 This Count is against Defendants, in their individual and official capacities,
 6 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Adult Video Only, Inc.,
 7 AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, and Cossette and Wright Partnership
 8 ("RCW 9A.82.060 Defendants").

9 14.3 As set forth above, RCW 9A.82.060 Defendants intentionally organized,
 10 managed, directed, supervised, and/or financed three or more persons with the intent to
 11 engage in a pattern of criminal profiteering activity in violation of RCW 9A.82.060(1)(a).

12 14.4 RCW 9A.82.060 Defendants, intentionally incited and/or induced others to
 13 engage in violence or intimidation with the intent to further promote the accomplishment of
 14 a pattern of criminal profiteering activity in violation of RCW 9A.82.060(1)(b), as stated
 15 herein.

16 14.5 RCW 9A.82.060 Defendants intended their acts to constitute a pattern of
 17 criminal profiteering activity in violation of RCW 9A.82.060(1)(a) and RCW 9A.82.060(1)(b).

18 14.6 As a direct and proximate result of RCW 9A.82.060 Defendants' acts and
 19 violations of RCW 9A.82.060(1)(a) and RCW 9A.82.060(1)(b), Plaintiffs' business, Desire
 20 Video, was trespassed upon and was burned to the ground. Plaintiffs' business, Desire Video,
 21 was trespassed upon and was burned to the ground. Plaintiffs' business operations,
 22 competitiveness, and profitability were compromised by the funding of Defendants'
 23 businesses, illegal or otherwise. Plaintiff Levi Bussanich livelihood and businesses were
 24 25

1 harmed. His life was solicited to be taken for money by RCW 9A.82.060 Defendants. He has
2 suffered immeasurable mental anguish.

3 14.7 RCW 9A.82.080 Defendants, in their individual and official capacities, Daniel
4 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
5 employees and/or agents who participated in arson and other acts set forth herein, under
6 the doctrine of *respondeat superior*.

7 14.8 The doctrine of piercing the corporate veil is appropriate against RCW
8 9A.82.060 Defendant corporate officers and corporate Defendants, as stated herein, because
9 each RCW 9A.82.060 Defendant had knowledge of, participated in, and approved of the
10 wrongful conduct described herein.

11 14.9 The injuries to Plaintiffs were directly and proximately caused by RCW
12 9A.82.060 Defendant and by virtue of violations to RCW 9A.82.060(1)(a) and RCW
13 9A.82.060(1)(b), RCW 9A.82.060 Defendants are liable to Plaintiffs for three time the
14 damages the Plaintiffs have sustained, plus the cost of this suit, including reasonable attorney
15 fees.

17 **XV. SEVENTH CAUSE OF ACTION: TRESPASS TO PROPERTY, PROPERTY
18 DAMAGE, AND/OR WASTE**

19 15.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
20 every allegation of the above paragraphs.

21 15.2 This Count is against Defendants, in their individual and official capacities,
22 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Mark Fuston, Jeremey
23 Coughlin, Adult Video Only, Inc., AAV Ltd, The Bookstore, Inc., The Bookstore, Inc.-2, The
24 Cossette and Wright Partnership ("Trespass Defendants").

1 15.3 The acts and omissions of Trespass Defendants include unlawfully entering
2 and burning Plaintiffs' business, Desire Video.

3 15.4 Trespass Defendants' acts and omissions constitute the tort of trespass on
4 Plaintiffs property, and were the direct and proximate cause of Plaintiffs' financial and
5 personal injuries.

6 15.5 As a direct and proximate result of the acts and omissions of Trespass
7 Defendants, Plaintiffs suffered general and special damages as set forth herein.

8 15.6 Trespass Defendants, in their individual and official capacities, Daniel
9 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
10 employees and/or agents who participated in arson and other acts set forth herein, under
11 the doctrine of *respondeat superior*.

13 15.7 The doctrine of piercing the corporate veil is appropriate against Trespass
14 Defendant corporate officers and corporate Defendants, as stated herein, because each
15 Trespass Defendant had knowledge of, participated in, and approved of the wrongful
16 conduct described herein.

17 15.8 The injuries to Plaintiffs were directly and proximately caused by Trespass
18 Defendants and by virtue of violations, Trespass Defendants are liable to Plaintiffs for the
19 damages the Plaintiffs have sustained, plus the cost of this suit, including reasonable attorney
20 fees, if available under state law.

22 **XVI. EIGHTH CAUSE OF ACTION: CONVERSION**

23 16.1 Plaintiffs hereby incorporate and re-allege as if fully set forth herein each and
24 every allegation of the above paragraphs.

25 16.2 This Count is against Defendants, in their individual and official capacities,

1 Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, Mark Fuston, Jeremey
2 Coughlin, Adult Video Only, Inc., AAV Ltd, The Bookstore, Inc., and The Bookstore, Inc.-2, The
3 Cossette and Wright Partnership ("Conversion Defendants").

4 16.3 The acts and omissions of Conversion Defendants include the unlawful, willful,
5 and complete destruction of Plaintiffs' business and property, Desire Video.

6 16.4 Conversion Defendants' acts and omissions constitute the tort of conversion
7 of Plaintiffs' property; Defendants wrongfully interfered with Plaintiffs' property without
8 lawful jurisdiction of it and deprived Plaintiffs of lawful possession.

9 16.5 Conversion Defendants' actions and omissions directly and proximately
10 caused the damage to Plaintiffs property.

12 16.6 As a direct and proximate result of the acts and omissions of Conversion
13 Defendants, Plaintiffs suffered general and special damages as set forth herein.

14 16.7 Defendants Daniel Cossette, Donna Cossette, Michael J. Wright, Linda M.
15 Wright, Adult Video Only, Inc., AAV Ltd, The Bookstore, Inc., and The Bookstore, Inc.-2 are
16 liable for the actions of individual Conversion Defendants and their employees and/or agents
17 who participated in arson and other acts set forth herein, under the doctrine of *respondeat
18 superior*.

19 16.8 Conversion Defendants, in their individual and official capacities, Daniel
20 Cossette, Donna Cossette, Michael J. Wright, Linda M. Wright, are liable for the actions of their
21 employees and/or agents who participated in arson and other acts set forth herein, under
22 the doctrine of *respondeat superior*.

24 16.9 The doctrine of piercing the corporate veil is appropriate against Conversion
25 Defendant corporate officers and corporate Defendants, as stated herein, because each

1 Conversion Defendant had knowledge of, participated in, and approved of the wrongful
2 conduct described herein.

3 16.10 The injuries to Plaintiffs were directly and proximately caused by Conversion
4 Defendants and by virtue of violations, Conversion Defendants are liable to Plaintiffs for the
5 damages the Plaintiffs have sustained, plus the cost of this suit, including reasonable attorney
6 fees, if available under state law.

7 **XVII. PRAYER FOR RELIEF**

8 17.1 WHEREFORE, Plaintiff requests that this Court enter judgment against
9 Defendants, including but not limited to the following:

10 a. Enter declaratory judgment that Defendants violated Plaintiffs' rights under
11 federal and state law;

12 b. Award Plaintiffs their nominal and actual damages;

13 c. Award Plaintiffs general and special damages in the amount to be determined at
14 trial, and hold Defendants jointly and severally liable for such damages;

15 d. Award Plaintiffs punitive damages in an amount to be determined at trial;

16 e. Award Plaintiff pre-judgment and post judgment interest as allowed by law;

17 f. Award Plaintiffs their reasonable costs, expenses and attorneys' fees, including
18 treble damages to remedy injuries to business and property to the extent
19 allowable under federal, e.g., 18 U.S.C. § 1962, and state law. Over \$5 million
20 dollars;

21 g. Grant such further relief as this court deems just and appropriate.

22
23 Dated this 25th day of March, 2016.

XVIII. JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Plaintiffs demand a trial by jury on all issues so triable.

Respectfully submitted this day of March 25, 2016.

Taylor Law Group, P.S.